

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY, LLC, et. al.,	§	Case No. 20-33948
	§	
Debtors.	§	
	§	
	§	(Jointly Administered)

**OBJECTION OF SPARROWS OFFSHORE, LLC TO CONFIRMATION  
OF THE FOURTH AMENDED JOINT CHAPTER 11 PLAN OF  
FIELDWOOD ENERGY LLC AND ITS AFFILIATED DEBTORS**

Sparrows Offshore, LLC ("Sparrows") files this Objection (the "Objection") to Confirmation of the *Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors* (the "Plan") [Docket No. 1252] and in support hereof respectfully states as follows:

1. Prior to the commencement of Fieldwood's bankruptcy, Sparrows provided goods and services to Fieldwood for which it was not paid. On September 18, 2020, Sparrows timely filed an unsecured Proof of Claim against Fieldwood Energy LLC in the amount of \$535,814.50. [Claim No. 151].

2. During the week of May 24, 2021, Sparrows was contacted by the Debtors and discovered that it remained in possession of a crane boom (the "Boom") over which the Debtors have an interest. Sparrows provided repair services on the Boom for which Sparrows has not been paid. It was later uncovered that Sparrows has a possessory secured lien on the Boom under Louisiana law. On June 1, 2021, Sparrows' counsel contacted Debtor's counsel with respect to this issue. The parties are discussing a resolution of this issue and this Objection is filed as a placeholder pending those discussions.

3. Sparrows files this Objection to the Plan to preserve its rights with respect to its claim and security interest in the Boom. For color, the Plan broadly provides for vesting of Assets of the

Estate in the Reorganized Debtors free and clear of liens under 11 U.S.C. § 1141(b) and (c). [Docket No. 1252 at § 10.2]. The Plan also broadly provides for the release of liens. [*Id.* at § 10.7(c)].

4. Although Sparrows is hopeful that this issue can be resolved by agreement, Sparrows will seek leave to file a late secured Proof of Claim if the issue cannot be resolved. As mentioned, this Objection is to preserve Sparrows' rights pending resolution of these issues either by agreement of the parties or order of the Court.

WHEREFORE, Sparrows, respectfully requests that the Court (i) preserve Sparrows' rights with respect to its claim and security interest and (ii) grant it such other and further relief to which it may be entitled.

Dated: June 2, 2021

Respectfully submitted,  
KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Michael P. Ridulfo  
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Attorney for Sparrows Offshore, LLC

### **CERTIFICATE OF SERVICE**

This is to certify that on June 2, 2021, a true and correct copy of the foregoing Objection was served via the Court's CM/ECF notification system.

/s/ Michael P. Ridulfo  
Michael P. Ridulfo